



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

03-02-07

04:59 PM

Order Instituting Rulemaking Into
Implementation of Federal Communications
Commission Report and Order 04-87, As It
Affects The Universal Lifeline Telephone
Service Program.

Rulemaking 04-12-001
(Filed December 2, 2004)

**PACIFIC BELL TELEPHONE COMPANY'S (U 1001 C) D/B/A AT&T
CALIFORNIA MOTION FOR CLARIFICATION OF THE FEBRUARY 28, 2007
ASSIGNED COMMISSIONER'S RULING DIRECTING CARRIERS TO
IMMEDIATELY COMPLY WITH GENERAL ORDER 153 AND DECISION 06-11-017
AND SETTING FOLLOWUP ACTIONS**

JAMES B. YOUNG
STEPHANIE HOLLAND

AT&T Services, Inc.
525 Market Street, Suite 2026
San Francisco, CA 94105
Tel.: (415) 778-1465
Fax: (415) 543-0418
E-mail: stephanie.holland@att.com

Attorneys for AT&T California

March 2, 2007

I. INTRODUCTION.

On February 28, 2007, Commissioner Grueneich issued an Assigned Commissioner's Ruling Directing Carriers to Immediately Comply with General Order 153 and Decision 06-11-017 and Setting Follow-up Actions (hereinafter, "2/28 ACR"). While AT&T California appreciates and supports the Assigned Commissioner's efforts to rectify the problems that have ensued since revisions to General Order 153 were adopted in D.05-12-013 and Resolution T-16996, AT&T California believes that the 2/28 ACR, as written, may be inconsistent with prior rulings and Decisions in this docket, as well as with General Order 153 itself. Clarification of the 2/28 ACR is needed.

One particular point that AT&T California wishes to emphasize is that, while it believes a Commission decision is necessary to prohibit carriers from imposing a conversion charge under Section 5.4.4 of General Order 153, AT&T California has no objection to the temporary suspension or permanent elimination of this charge for customers who fail the Certification process.

II. DISCUSSION.

A. D.06-11-017 did not Suspend the Service Conversion Charge in Section 8.1.3 of General Order 153 for *all* Classes of Customers, as the 2/28 ACR Seems to Suggest.

On November 1, 2006, the Assigned Commissioner issued a ruling (hereinafter, "11/1 ACR") that sought to temporarily suspend certain provisions of Commission General Order 153 dealing with the annual Verification process for the California Lifeline program.¹ In D.06-11-017, the Commission ratified, with modifications, the 11/1 ACR.

D.06-11-017 directs that any customers "who did not respond or who responded late" to the annual Lifeline Verification notices mailed between July 1, 2006 through November 1, 2006

¹ The annual Verification process refers to a "process that an existing [Lifeline] customer must undergo annually to remain on the [Lifeline] program." General Order 153, Section 2.1.59. In brief, it requires Lifeline customers to complete and return a "Verification" form within 30 days of its receipt in order to remain in the Lifeline program. General Order 153, Appendix E.

shall be reinstated in the Lifeline program.² Additionally, it states that Section 8.1.3 of General Order 153 shall be suspended “*only as it relates to this customer group*” (emphasis added).³ By contrast, the 2/28 ACR states:

[B]oth AT&T and Verizon continue to bill customers for the service conversion charge in Section 8.1.3 of this Commission’s GO 153, despite the six-month suspension of these charges in D.06-11-017.⁴

AT&T California has two concerns with the ACR’s language. First, it suggests the Commission suspended the conversion charge set forth in Section 8.1.3 as a blanket matter. That is not the case. D.06-11-017 specifies that the conversion charge in Section 8.1.3 of General Order 153 is suspended “only as it relates to this customer group” -- *i.e.*, customers who “were mailed annual verification notices from the period of July 1, 2006 up until...November 1, 2006” and “who did not respond or who responded late.”⁵ Further, D.06-11-017 specifically acknowledges that “those customers who do respond and timely return the [annual Verification] form to the certifying agent (Solix) will have their forms processed by Solix.”⁶ As such, other than the customers reinstated into the Lifeline program after they were removed from it for failing to timely respond to the annual Verification notices for the period identified above, D.06-11-017 does not prohibit the imposition of the Section 8.1.3 conversion charge.⁷

Second, the 2/28 ACR states that, since November 2006, AT&T California has continued to impose the Section 8.1.3 conversion charge in violation of D.06-11-017. This statement is inaccurate. Section 8.1.3 conversion charges are triggered when an existing customer enrolls in the Lifeline program. Again, D.06-11-017 only suspended the Section 8.1.3 conversion charge for customers who were reinstated to the Lifeline program after being removed from it for failing

² D.06-11-017, *mimeo*, p. 3.

³ *Id.* at p. 4.

⁴ 2/28/07 ACR, *mimeo*, p. 1.

⁵ D.06-11-017, *mimeo*, pp. 3-4.

⁶ *Id.* at p. 4 (emphasis in original).

⁷ Verification customers that were removed from the Lifeline program for “form late” and “form not returned” reasons were identified by the Certifying Agent, Solix. This list of customers was then provided to AT&T California for reinstatement into the Lifeline program.

to timely respond to annual Verification notices that were mailed between July 1 and November 1, 2006. As directed by D.06-11-017, AT&T California did, in fact, waive the Section 8.1.3 conversion charge when it reinstated the foregoing group of customers into the Lifeline program. While AT&T California does continue to impose the Section 8.1.3 charge on all *other* customers that continue to enroll in the Lifeline program, it is not a violation of D.06-11-017 to do so.

In short, the ACR should be clarified to make clear that D.06-11-017 did not suspend the Section 8.1.3 conversion charge as a blanket matter. Rather, D.06-11-017 suspended it only as it relates to customers “who did not respond or who responded late” to “annual verification notices [mailed] from the period of July 1, 2006 up until...November 1, 2006” and subsequently were reinstated into the Lifeline program.⁸ Additionally, the ACR should be clarified to omit the suggestion that AT&T California has violated D.06-11-017 by imposing the Section 8.1.3 conversion charge on other groups of customers.

B. Procedurally, the Commission Should Issue a Decision to Suspend the Certification Conversion Charges that the 2/28 ACR Seeks to Suspend.

In contrast to the annual *Verification* process (which refers to a process that an *existing* Lifeline customer must undergo annually to remain on the Lifeline program), the Lifeline program also has a *Certification* process, which is a process “that a customer must undergo when applying to enroll” in the Lifeline program for the first time to certify Lifeline eligibility.⁹ With respect to the Certification process, the 2/28 ACR effectively seeks to modify AT&T California’s tariff and General Order 153 by prohibiting carriers from imposing conversion charges on customers who apply for the Lifeline program and subsequently are found not to meet the Lifeline eligibility requirements:

I am also directing that in complying with GO 153[,] conversion/regrade charges not be imposed on a customer who is unsuccessful in its certification request and is by certification denial placed in a non-LifeLine service. To the extent that customers have been billed the conversion/regrade charges, (*i.e.*, charges beyond those authorized in GO 153, Section 5.4.4),

⁸ D.06-11-017, *mimeo*, pp, 3-4.

⁹ General Order 153, Section 2.1.8.

carriers are instructed to credit or refund those charges to customers who initiated the certification process on or after July 1, 2006, consistent with the requirements of D.06-11-017. The certification process is not suspended for reasons discussed in D.06-11-107.¹⁰

While the ACR suggests it is merely ordering carriers to comply with the existing mandates of General Order 153 and D.06-11-017, neither G.O. 153 nor D.06-11-017 prohibits the imposition of a conversion charge on customers that are deemed ineligible to participate in the Lifeline program during the Certification process. The only conversion charges that D.06-11-017 currently prohibits are conversion charges on customers who were reinstated into the Lifeline program after being removed for failing to respond timely to Verification notices mailed between July 1 and November 1, 2006. With respect to General Order 153, Section 5.4.4 specifically authorizes carriers to impose various charges for having to convert a customer from Lifeline to regular service due to the customer's ineligibility for the Lifeline program:

Any customer who fails to qualify for ULTS by the certification date shall be removed from the ULTS program and converted to regular service. Upon notification from the CertA, the utility shall bill the customer for all ULTS discounts received by the customer, including all previously waived or discounted charges, service initiation charges, end user common line charges, taxes, and surcharges associated with ULTS discounts.¹¹

General Order 153 establishes two different processes to be managed by Solix -- the Certification of customers to enroll in Lifeline and the Verification of existing Lifeline customers. There are two separate sections of the General Order that address the outcome of those two processes: Section 5.4.4 deals with charges to customers who fail the Certification process, and Sections 5.6 and 5.8 deal with charges to existing Lifeline customers who are no longer eligible for Lifeline and fail the Verification process.

While Section 5.4.4 does not specifically identify a conversion charge as one of the charges that may be imposed when a customer fails the Certification process, it also does not limit the list of permissible charges to those specifically enumerated. To the contrary, it says that

¹⁰ 2/28 ACR, *mimeo*, pp. 6-7.

¹¹ General Order 153, Section 5.4.4.

the charges that the utility may impose on the customer for the conversion “include[]” those enumerated in Section 5.4.4. Had the Commission intended this list to be exhaustive, Section 5.4.4 presumably would have stated that the charges that a utility may impose for such a conversion “are limited to” those specified therein.

In those instances, moreover, where the Commission did intend to prohibit the imposition of conversion charges, it made sure that General Order 153 specifically said so. For example, Section 5.6 of the General Order states that “[n]o service conversion charges shall be billed to the customer” where a customer voluntarily notifies the utility of the customer’s ineligibility to continue participating in the Lifeline program. Similarly, Section 5.8 says that “[n]o service conversion charges shall be billed to the customer” where the customer reveals through the annual Verification process that he or she is no longer eligible to participate in the Lifeline program.

In light of the foregoing, it is not accurate to say that conversion charges are “charges beyond those authorized in GO 153, Section 5.4.4.”¹² In fact, they are permitted by Section 5.4.4 and also consistent with AT&T California’s tariff.¹³ AT&T California has no objection to the temporary suspension or permanent elimination of the Section 5.4.4 conversion charge for customers who fail the Certification process. However, because the effect of doing so would be to modify the provisions of General Order 153 and AT&T California’s tariffs that currently permit the imposition of this charge, the proper way to suspend it is via a Commission Decision, not an Assigned Commissioner’s Ruling. As such, to the extent the ACR seeks to suspend conversion charges under Section 5.4.4, AT&T California requests the clarification identified below.

¹² 2/28 ACR, mimeo, p. 6.

¹³ Schedule Cal. P.U.C. No. A3, Section 3.2.6.b.

C. Other Provisions Requiring Clarification.

Ruling Paragraphs 7 and 8 of the 2/28 ACR read as follows:

7. All customers deemed ineligible under the current LifeLine certification process shall be held harmless from the imposition of all charges that would otherwise not accrue pursuant to GO 153 Section 5.4.4.

8. All customers deemed ineligible under the current LifeLine certification process should not be subject to charges beyond those specified in GO 153 Section 5.4.4.

Putting aside the question whether an Assigned Commissioner's Ruling (in lieu of a Commission decision) can prohibit carriers from imposing conversion charges on customers who are found during the Certification process to be ineligible to participate in the Lifeline program (which is addressed in Section B. above), AT&T California is unclear how the meaning of Ruling Paragraphs 7 and 8 differ. If Ruling Paragraph 7 seeks to impose some obligation or relief that is different from that imposed by Ruling Paragraph 8, it should be so clarified. AT&T California interprets the 2/28 ACR to require AT&T California to waive conversion charges of \$14.25, which it has been charging pursuant to Section 5.4.4 of General Order 153 for any customer who fails to be certified for the Lifeline program with those charges recovered from the fund, consistent with General Order 153. AT&T California asks for clarification of the ACR on this point and for clarification on the duration of any such waiver.

Dated at San Francisco, California, this 2nd day of March 2007.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Stephanie Holland", written over a horizontal line.

STEPHANIE HOLLAND

JAMES B. YOUNG
AT&T Services, Inc.
525 Market Street, Suite 2026
San Francisco, CA 94105
Tel.: (415) 778-1465
Fax: (415) 543-0418
E-mail: stephanie.holland@att.com

Attorneys for AT&T California

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **PACIFIC BELL TELEPHONE COMPANY'S (U 1001 C) D/B/A AT&T CALIFORNIA MOTION FOR CLARIFICATION OF THE FEBRUARY 28, 2007 ASSIGNED COMMISSIONER'S RULING DIRECTING CARRIERS TO IMMEDIATELY COMPLY WITH GENERAL ORDER 153 AND DECISION 06-11-017 AND SETTING FOLLOWUP ACTIONS in R.04-12-001** by electronic mail and/or by hand-delivery or mailing to the person in the official Service List.

Executed this 2nd day of March 2007, at San Francisco, California.

AT&T CALIFORNIA
525 Market Street, 20th Floor
San Francisco, CA 94105



Michelle K. Choo

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0412001 - CPUC-ILECS, CLECS -

Filer: CPUC - ILECS, CLECS

List Name: INITIAL LIST

Last changed: February 28, 2007

[Download the Comma-delimited File](#)
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

Appearance

JEFF SCHNUR
SOLIX INC.
PO BOX 902
100 S. JEFFERSON ROAD
WHIPPANY, NJ 07981

KIMBERLY KRETCHMER
CITIZENS TELECOM COS OF CA/GS/TU
180 S. CLINTON AVENUE
ROCHESTER, NY 14646-0400

ROSS A. BUNTROCK
WOMBLE CARLYLE SANDRIDGE & RICE PLLC
1401 EYE STREET, N.W. SEVENTH FLOOR
WASHINGTON, DC 20005
510

OLIVIA B. WEIN
ATTORNEY AT LAW
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE., NW., STE.
WASHINGTON, DC 20036

SEAN WILSON
TALK.COM
12020 SUNRISE VALLEY, STE.250
RESTON, VA 20191

SHARON THOMAS
TECHNOLOGIES MANAGEMENT, INC.
210 N. PARK AVE.
WINTER PARK, FL 32789

ERIN DAWLEY
HORNITOS TELEPHONE COMPANY
PO BOX 5158
MADISON, WI 53705-0158

PETER GLASS
SEREN INNOVATIONS, INC.
15 SOUTH 5TH STREET, STE 500
MINNEAPOLIS, MN 55402

KRISTIE FLIPPO
TIME WARNER CONNECT
15303 DALLAS PARKWAY, SUITE 610
ADDISON, TX 75001

KARL ANDREW
REGULATORY AFFAIRS
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY SO, STE 100
ALLEN, TX 75013-2789

GLADYS K. STRONG
SPECIALIST-REGULATORY
600 HIDDEN RIDGE - HQE02E88
IRVING, TX 75038

MICHAEL MORCOM
VERIZON SELECT SERVICES, INC.
600 HIDDEN RIDGE, HQE01J016
IRVING, TX 75038

KAREN BAILEY
VERIZON WEST COAST
VERIZON CALIFORNIA, INC.
HQE01G69
600 HIDDEN RIDGE DR., E01E55
IRVING, TX 75038-2092

MARY PHARO
VAR TEC TELECOM, INC.
1600 VICEROY DRIVE
DALLAS, TX 75235

DAVID MORIARTY
MEDIA ONE/AT&T BROADBAND
550 CONTINENTAL BLVD.
EL SEGUNDO, CA 90245

JEFF COMPTON
VICE RESIDENT CARRIER RELATIONS
TELSCAPE COMMUNICATIONS INC.
606 EAST HUNTINGTON DRIVE
MONROVIA, CA 91016

DON EACHUS
VERIZON CALIFORNIA, INC.
CA501LB
112 S. LAKE LINDERO CANYON ROAD
THOUSAND OAKS, CA 91362

JACQUE LOPEZ
LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

JESUS G. ROMAN
ATTORNEY AT LAW
VERIZON CALIFORNIA, INC.
112 S. LAKEVIEW CANYON ROAD, CA501LB
THOUSAND OAKS, CA 91362

LORRAINE A. KOCEN
VERIZON CALIFORNIA INC.
112 S. LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

W. LEE BIDDLE
ATTORNEY AT LAW
FERRIS & BRITTON, P.C.
401 WEST A STREET, SUITE 1600
SAN DIEGO, CA 92101

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

JOY C. YAMAGATA
REGULATORY CASE MANAGER
SEMPRA UTILITIES
8330 CENTURY PARK COURT CP 32 D
SAN DIEGO, CA 92123

DALE DIXON
ATTORNEY AT LAW
VYCERA COMMUNICATIONS, INC.
12750 HIGH BLUFF DRIVE, SUITE 200
SAN DIEGO, CA 92129

THALIA R. GIETZEN
VYCERA COMMUNICATION, INC.
12750 HIGH BLUFF DR., STE.200
SAN DIEGO, CA 92130-2565

BRIAN PLACKIS CHENG
BLUE CASA COMMUNICATIONS
911 OLIVE STREET
SANTA BARBARA, CA 93101

ERIC WOLFE
REGULATORY
DUCOR TELEPHONE COMPANY
PO BOX 42230
BAKERSFIELD, CA 93384-2230

DAVE CLARK
KERMAN TELEPHONE COMPANY
811 S MADERA AVE.
KERMAN, CA 93630

LINDA BURTON
PO BOX 219
OAKHURST, CA 93644

DAN DOUGLAS
THE PONDEROSA TELEPHONE CO.
PO BOX 21
O'NEALS, CA 93645

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
RM. 375
SAN FRANCISCO, CA 94102

MARGARITA GUTIERREZ
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE,

SAN FRANCISCO, CA 94102

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

ANNA KAPETANAKOS
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2024
SAN FRANCISCO, CA 94105

GRETA BANKS
AT&T COMMUNICATIONS OF CALIFORNIA
525 MARKET STREET, 18TH FLOOR, 4
SERVICES
SAN FRANCISCO, CA 94105

LOUIE DE CARLO
COMPLIANCE MANAGER
MCI METRO ACCESS TRANSMISSION

201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105

PETER M. HAYES
GENERAL MANAGER
PACIFIC BELL TELEPHONE COMPANY
140 NEW MONTGOMERY ST., RM 922
SAN FRANCISCO, CA 94105

ROBERT B. RYAN
SBC
140 NEW MONTGOMERY, ROOM 1909
SAN FRANCISCO, CA 94105

GLENN STOVER
ATTORNEY AT LAW
STOVER LAW
221 MAIN STREET, SUITE 800
SAN FRANCISCO, CA 94105-1906

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

JOHN L. CLARK
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

JOHN A. GUTIERREZ
COMCAST
12647 ALCOSTA BOULEVARD, SUITE 200
SAN RAMON, CA 94544

JOSEPHINE WONG
APEX TELECOM INC.
PO BOX 1917
OAKLAND, CA 94604

C. HONG WONG
APEX TELECOM, INC.
113 10TH STREET
OAKLAND, CA 94607

LATANYA LINZIE
COX CALIFORNIA TELCOM, L.L.C.
REGULATOR
2200 POWELL STREET, SUITE 1035
COMM
EMERYVILLE, CA 94608

DOUGLAS GARRETT
VICE PRESIDENT, WESTERN REGION
COX CALIFORNIA TELCOM, LLC, DBA COX
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608-2618

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

LORRIE BERNSTEIN
PINNACLES TELEPHONE COMPANY
340 LIVE OAK ROAD
PAICINES, CA 95043-9998

EDWARD J SCHNEIDER, JR
FORESTHILL TELEPHONE CO., INC.
4655 QUAIL LAKES DR.
STOCKTON, CA 95207

LYNNE MARTIN
PAC-WEST TELECOMM, INC.
1776 MARCH LANE, SUITE 250
STOCKTON, CA 95207

LORRIE BERNSTEIN
MOSS ADAMS LLP
3121 WEST MARCH LANE, STE. 100
STOCKTON, CA 95219-2303

YVONNE SMYTHE
CALAVERAS TELEPHONE COMPANY
PO BOX 37
COPPEROPOLIS, CA 95228

LINDA COOPER
GLOBAL VALLEY NETWORKS, INC.
515 KEYSTONE BLVD.
PATTERSON, CA 95363-8861

ROSE CULLEN
THE VOLCANO TELEPHONE COMPANY
PO BOX 1070
PINE GROVE, CA 95665-1070

LINDA LUPTON
REGULATORY MANAGER
SUREWEST TELEPHONE
PO BOX 969
ROSEVILLE, CA 95678

JOLEEN HOGAN
CAL-ORE TELEPHONE COMPANY
PO BOX 847
DORRIS, CA 96023

JAMES LOWERS
THE SISKIYOU TELEPHONE COMPANY
PO BOX 157
ETNA, CA 96027

GAIL LONG
TELEPHONE COMPANY
HAPPY VALLEY/HORNITOS/WINTERHAVEN
PO BOX 1566
OREGON, OR 97045

Information Only

ADRIENNE M. MERCER
REGULATORY COMPLIANCE ANALYST
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY S, STE 100
ALLENT, TX 75013

BETTINA CARDONA
PRESIDENT
FONES4ALL CORPORATION
6320 CANOGA AVE, SUITE 650
WOODLAND HILLS, CA 91367

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105

GLENNDA KOUNTZ
REGULATORY ASSISTANT
KERMAN TELEPHONE CO.
811 S. MADERA AVENUE
KERMAN, CA 93630

JULIE WEIGAND
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVENUE, SUITE 103
FRESNO, CA 93650

MARGARET L. TOBIAS
ATTORNEY AT LAW
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

SUZANNE TOLLER
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
TELECOMMUNICATIONS
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

CHARLES E. BORN
MANAGER-STATE GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS
PO BOX 340
ELK GROVE, CA 95759

JOE CHICOINE
MANAGER, STATE GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

State Service

ANGELA YOUNG
CALIF PUBLIC UTILITIES COMMISSION
FISCAL & ADMINISTRATIVE SERVICES
BRAN
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONNA L. WAGONER
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
JUDGES
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JESSICA T. HECHT
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW

ROOM 5113
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSIE WEBB
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN A. DEGANNES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN JONES
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ISSUES BRA
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE BILLINGSLEY
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER

ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

[Top of Page](#)
[Back to INDEX OF SERVICE LISTS](#)